

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Chapter 11
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, <i>et al.</i> ,	§	(Jointly Administered)
Debtors. ¹	§	
	§	

**AMENDED² AGENDA OF MATTERS SET FOR EMERGENCY
HYBRID HEARING ON JULY 31, 2024 AT 1:00 P.M. (CENTRAL TIME)**

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN 1:00 P.M. (CENTRAL TIME) ON JULY 31, 2024.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JULY 31, 2024 AT 1:00 P.M. (CENTRAL TIME) IN COURTROOM 401, 4TH FLOOR, 515 RUSK AVENUE, HOUSTON, TX 77002. YOU MAY PARTICIPATE IN THE HEARING IN-PERSON OR BY AN AUDIO AND VIDEO CONNECTION.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE. THE MEETING CODE IS "JUDGELOPEZ". CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE LOPEZ'S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), hereby file

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

² *Any changes or additions to the Agenda of Matters Set for Emergency Hybrid Hearing on July 31, 2024 at 1:00 p.m. (Central Time) (Docket No. 1749) are reflected in bold and italicized font.*

this Agenda of Matters Set for Hearing on **July 31, 2024 at 1:00 p.m. (Central Time)** before the Honorable Christopher M. Lopez.

I. EMERGENCY MATTERS

1. **Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711)**

Status: This matter is going forward on an emergency basis.

Responses Filed:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1743)
- B. *Statement & Reservation of Rights of 1199SEIU United Healthcare Workers East to the Debtors' Emergency Motion for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1752)*
- C. *Massachusetts' Statement in Response to (I) the Emergency Motion by Steward Approving Funding, Hospital Closures, and Related Relief [ECF No. 1711] and (II) the Emergency Motion by Steward to Reject Master Lease II, and Related Relief [ECF No. 1712] (Docket No. 1753)*

- D. *Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights and Request for Related Relief (Docket No. 1757)*
- E. *Response of the Roman Catholic Archbishop of Boston, A Corporation Sole, to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1758)*
- F. *Objection and Response of MPT and Master Lease II Lessors to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1759)*
- G. *Statement of Suzanne Koenig, as Patient Care Ombudsman, in Response to the Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1764)*
- H. *Objection of Commonwealth of Pennsylvania to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1767)*

- I. *Objection and Reservation of Rights to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1768)*
- J. *Joinder of the Florida Agency for Health Care Administration in the Objection of Commonwealth of Pennsylvania to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1772)*

Related Documents:

- A. Declaration of John R. Castellano in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1713)
- B. Declaration of Toby King in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1714)
- C. Declaration of James Moloney in Support of Emergency Motion of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1717)

- D. Declaration of Octavio J. Diaz in Support of Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1718)
- E. Debtors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1727)
- F. Notice of Deposition of John R. Castellano (Docket No. 1728)
- G. Massachusetts Nurses Association's Cross Notice of Deposition of John R. Castellano (Docket No. 1746)
- H. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1747)
- I. *Medical Properties Trust, Inc.'s Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1750)*
- J. *Declaration of Dana Simon in Support of Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights and Request for Related Relief (Docket No. 1761)*
- K. *Massachusetts Nurses Association Witness and Exhibit List (Docket No. 1773)*

- L. *Declaration of Audra Sprague In Support of Massachusetts Nurses Association's Combined Objection To Emergency Motion of Debtors For Entry of An Order (I) Approving (A) Funding From the Commonwealth of Massachusetts For the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related To Facility Closures; and (II) Granting Related Relief (Docket No. 1711), and Response To Emergency Motion of Debtors For Order (I) Authorizing Rejection of Master Lease II Agreements Effective As of the Rejection Date In Connection With Planned Transition And Sale of Massachusetts Hospitals To New Operators, and (II) Granting Related Relief (Docket No. 1774)*
- M. *Supplement To Declaration of Dana Simon In Support of Massachusetts Nurses Association's Combined Objection To Emergency Motion of Debtors For Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts For the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital And Nashoba Valley Medical Center, and (C) Procedures Related To Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response To Emergency Motion of Debtors For Order (I) Authorizing Rejection of Master Lease II Agreements Effective As of the Rejection Date In Connection With Planned Transition and Sale of Massachusetts Hospitals To New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights And Request For Related Relief (Docket No. 1775)*
- N. *Massachusetts Nurses Association First Supplemental Witness and Exhibit List (Docket No. 1777)*
- O. *Notice of Filing July 31, 2024 Hearing Demonstrative (Docket No. 1778)*
- P. *Notice of Filing of Revised Proposed Order (I) Approving (A) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (B) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1779)*

2. **Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief (Docket No. 1712)**

Status: This matter is going forward on an emergency basis.

Responses Filed:

- A. ***Massachusetts' Statement in Response to (I) the Emergency Motion by Steward Approving Funding, Hospital Closures, and Related Relief [ECF No. 1711] and (II) the Emergency Motion by Steward to Reject Master Lease II, and Related Relief [ECF No. 1712] (Docket No. 1753)***
- B. ***Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights and Request for Related Relief (Docket No. 1757)***
- C. ***Objection of MPT and Master Lease II Lessors to Emergency Motion to Reject Master Lease II; and Cross-Motion to Condition Relief on Provision of Adequate Protection (Docket No. 1760)***

Related Documents:

- A. Declaration of John R. Castellano in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1713)

- B. Declaration of Toby King in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1714)
- C. Declaration of James Moloney in Support of Emergency Motion of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1717)
- D. Debtors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1727)
- E. Notice of Deposition of John R. Castellano (Docket No. 1728)
- F. Massachusetts Nurses Association's Cross Notice of Deposition of John R. Castellano (Docket No. 1746)
- G. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1747)
- H. *Medical Properties Trust, Inc.'s Witness and Exhibit List for Hearing on July 31, 2024 (Docket No. 1750)*
- I. *Declaration of Dana Simon in Support of Massachusetts Nurses Association's Combined Objection to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response to Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights and Request for Related Relief (Docket No. 1761)*

- J. *Massachusetts Nurses Association Witness and Exhibit List (Docket No. 1773)*
- K. *Declaration of Audra Sprague In Support of Massachusetts Nurses Association's Combined Objection To Emergency Motion of Debtors For Entry of An Order (I) Approving (A) Funding From the Commonwealth of Massachusetts For the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related To Facility Closures; and (II) Granting Related Relief (Docket No. 1711), and Response To Emergency Motion of Debtors For Order (I) Authorizing Rejection of Master Lease II Agreements Effective As of the Rejection Date In Connection With Planned Transition And Sale of Massachusetts Hospitals To New Operators, and (II) Granting Related Relief (Docket No. 1774)*
- L. *Supplement To Declaration of Dana Simon In Support of Massachusetts Nurses Association's Combined Objection To Emergency Motion of Debtors For Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts For the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital And Nashoba Valley Medical Center, and (C) Procedures Related To Facility Closures; and (II) Granting Related Relief [Docket No. 1711], and Response To Emergency Motion of Debtors For Order (I) Authorizing Rejection of Master Lease II Agreements Effective As of the Rejection Date In Connection With Planned Transition and Sale of Massachusetts Hospitals To New Operators, and (II) Granting Related Relief [Docket No. 1712], Reservation of Rights And Request For Related Relief (Docket No. 1775)*
- M. *Massachusetts Nurses Association First Supplemental Witness and Exhibit List (Docket No. 1777)*
- N. *Notice of Filing July 31, 2024 Hearing Demonstrative (Docket No. 1778)*
- O. *Notice of Filing of Revised Proposed Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief (Docket No. 1780)*

Dated: July 31, 2024
Houston, Texas

/s/ Clifford W. Carlson
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*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on July 31, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson
Clifford W. Carlson